

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

STATE FARM MUTUAL AUTOMOBILE)	
INSURANCE COMPANY)	
)	
Plaintiff,)	
)	
v.)	Case No. 10-cv-3848(ILG)(RML)
)	Judge I. Leo Glasser
JOHN MCGEE, et al.)	Mag. Judge Robert M. Levy
)	
Defendants.)	

[PROPOSED] ORDER

This matter having come before the Court on September 20, 2012 for hearing, IT IS
HEREBY ORDERED THAT:

1. The schedule in this matter is amended as follows:

November 6, 2012	Deadline for amendment of pleadings and joinder of additional parties
December 15, 2012	Fact Discovery Cut-Off
January 31, 2013	Plaintiff's Expert Disclosures Due
February 28, 2013	Expert Rebuttal Reports Due
May 30, 2013	Expert Discovery Cut-Off
June 30, 2013	Dispositive Motions Deadline

2. In the event State Farm seeks to amend the complaint on or before November 6, 2012, the following schedule will apply:

November 6, 2012	State Farm will circulate its proposed amended complaint to Defendants by this date
November 13, 2012	Defendants must advise State Farm in writing of any objection to the filing of an amended complaint by this date
November 20, 2012	In the event any Defendant notifies State Farm of an objection to the proposed amended complaint, State Farm must file a motion

for leave to amend the complaint by this date. Alternatively, if no Defendant has objected in writing to the amended complaint by November 13, 2012, State Farm is granted leave to file its amended complaint on or before November 20, 2012.

December 7, 2012 Defendants' responses to State Farm's motion for leave to amend its complaint must be filed by this date.

December 14, 2012 State Farm's reply in support of its motion for leave to amend its complaint must be filed by this date.

3. If State Farm amends its complaint and any new parties are joined, State Farm will make available to any such new parties, at State Farm's cost, copies of any written discovery responses or documents produced by State Farm, any Defendant, or any third-parties in this matter, as well as copies of any deposition transcripts and video and audio recordings of such depositions that have been taken in this lawsuit through the date of amendment. State Farm will copy current Defendants' counsel on any correspondence it sends to new parties enclosing such discovery.

4. If State Farm amends its complaint and any new parties are joined, there may be no duplication of questions previously asked in interrogatories, document requests, or in depositions.

5. The status hearing currently set for November 9, 2012 is vacated and re-set to January 10, 2013 at 3:00 p.m. EST. State Farm will circulate a call-in number to the Court and all counsel of record in advance of that hearing.

Dated: September 28, 2012

Respectfully submitted,

Katten Muchin Rosenman LLP

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Counsel for the Romero defendants

September __, 2012

Entered by: _____

Hon. Robert M. Levy

CERTIFICATE OF SERVICE

I hereby certify that on September 28, 2012, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ Emily J. Prentice

Attorney for Plaintiff